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December 15, 1993

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

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DEC 15 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Amendment of Section 73.202(b),
FM Table of Allotments
Bagley and Park Rapids, Minnesota
(MM Docket No. ~~93-883~~; RM-8314; RM-8379)

Dear Mr. Caton:

93-243

Transmitted herewith on behalf of Edward P. DeLaHunt is an original and four copies of his reply comments in the above-referenced proceeding. These reply comments are respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,


John F. Garziglia

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of
 Amendment of Section 73.202(b),
 Table of Allotments,
 FM Broadcast Stations.
 (Bagley and Park Rapids, Minnesota)

) MM Docket No. 93-243

) RM-8314

) RM-8379 **RECEIVED**

DEC 15 1993

To: Chief, Allocations Branch

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

REPLY COMMENTS

Edward P. DeLaHunt, by his attorneys, pursuant to Public Notice Report No. 1988, released November 30, 1993, hereby submits his reply comments to the November 16, 1993 Reply Comments of Roger Paskvan. In reply thereto, the following is submitted:

1. Roger Paskvan proposed the allotment of Channel 223A to Park Rapids, Minnesota, as a third local transmission service.^{1/} Edward P. DeLaHunt proposed the allotment of Channel 222C3 to Bagley, Minnesota as that community's first local transmission service.

2. The Commission's allotment priorities are well settled and are set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). These priorities are:

- (1) First full-time aural service;
 - (2) Second full-time aural service;
 - (3) First local service;
 - (4) Other public interest matters.
- [Co-equal weight given on priorities (2) and (3)].

The allotment of Channel 222C3 to Bagley, Minnesota will fulfill allotment priority (3) while the allotment of Channel 223A to

^{1/} Radio stations KPRM(AM) and KDKK-FM are currently licensed to Park Rapids, Minnesota.

Park Rapids, Minnesota will, at best, fulfill allotment priority (4). The allotment of Channel 222C3 to Bagley, Minnesota should be preferred under these established allotment priorities since it will provide a first local transmission service.

3. Roger Paskvan suggests in his Reply Comments that Channels 223A, 231A, 233A and 240A are available for allotment to Park Rapids consistent with all applicable allotment criteria. Unfortunately, as shown in the attached engineering statement, it does not appear that any one of these channels is available as an alternate allotment to Park Rapids.^{2/} Thus, the communities of Park Rapids and Bagley must be compared to determine which is deserving of the allotment at issue in this proceeding.

4. In determining whether Park Rapids should receive an allotment of Channel 223A or Bagley should receive an allotment of Channel 222C3, the overriding factors to consider, as noted above, are the Commission's allotment priorities. Under the Commission's allotment priorities, the allotment of Channel 222C3 to Bagley is preferred as it brings to Bagley a first local transmission service. A comparison of the population of the two communities reveals that, using 1990 population data, the two communities are substantially similar in size. Park Rapids has a population of 2,863 persons, while Bagley has a population of

^{2/} As shown in the attached engineering statement, Channel 223A is short spaced to the Bagley counterproposal for Channel 222C3; Channel 231A is short spaced to a proposed allotment of Channel 231C1 to Red Lake Indian Reservation, Minnesota; Channel 233A is short spaced to an allotment of Channel 234C3 to Staples, Minnesota and Channel 236C1 to Detroit Lakes, Minnesota; and Channel 240A is short spaced to a proposed allotment of Channel 240A to Pillager, Minnesota.

1,388 persons. Both are small communities and it is noteworthy that Park Rapids already has two local transmission services. Of more significance, as detailed in the attached engineering statement, the proposal to allot Channel 222C3 to Bagley will serve an estimated population of 23,351, while the proposal to allot Channel 223A to Park Rapids will serve an estimated population of 14,730. Thus, the proposal to allot Channel 222C3 to Bagley will serve 63% more population than the proposal to allot Channel 223A to Park Rapids, and the Bagley channel allotment is to be preferred as a more efficient use of the radio spectrum.

5. Edward P. DeLaHunt has a present intention to apply for the channel if allotted, either individually or through a corporation owned by him, and if authorized, to build a station promptly.

WHEREFORE, for the reasons above, Channel 222C3 should be allotted to Bagley, Minnesota.

Respectfully submitted,

EDWARD P. DELAHUNT

By: _____


John F. Garziglia
His Attorney

Pepper & Corazzini
1776 K Street, N.W.
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Washington, D.C. 20006
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December 15, 1993

ORIGINAL

**ENGINEERING STATEMENT
SUPPORTING REPLY COMMENTS FOR A COUNTERPROPOSAL TO
MM DOCKET NO. 93-243
RM-8379**

Proponent: DeLaHunt Broadcasting Corporation

I, Edward P. DeLaHunt, hereby submit this engineering statement in support of a Counterproposal to MM Docket No. 93-243 (Rulemaking No. RM-8379, released November 30, 1993). This statement sets forth the merits of a new allotment for Bagley, Minnesota on Channel 222C3.

The following changes are proposed by Roger Paskvan in Docket No. 93-243 (RM-8314):

		Channel No.
	Present	Proposed
Park Rapids, MN	248C1	223A, 248C1

The following changes were counterproposed by myself:

		Channel No.
	Present	Proposed
Park Rapids, MN	248C1	248C1
Bagley, MN	-----	222C3

PROPOSED BAGLEY ALLOCATION

Bagley, Minnesota with a 1990 U.S. Census population of 1,388 persons, has no local FM, AM or TV service. The above mentioned counterproposal as described in RM-8379, would bring a first local broadcast service to Bagley, and would not deprive Park Rapids, Minnesota of local service.

Reference coordinates for the proposed Bagley allotment are: North Latitude 47° 25' 23", West Longitude 95° 23' 21". Attached as Exhibit 1 is an FM channel study from the proposed reference coordinates. As can be seen in the table, the proposed 222C3 allotment will meet all FCC spacing requirements. Principal city grade coverage will also be met.

PROPOSED PARK RAPIDS ALLOCATION

Park Rapids, Minnesota has a population of 2,863 persons. Mr. Paskvan requested assignment of Channel 223A to Park Rapids, Minnesota as a second FM service. In his Reply Comments, Mr. Paskvan states that Channel 223A plus Channels 231A, 233A and 240A are available for allotment to Park Rapids, Minnesota. Our studies indicate that these above alternative channels do not meet FCC minimum distance separations under Section 73.207 of the Rules. Attached as Exhibits 2-5 are the applicable channel studies.

COVERAGE COMPARISON

Though the city of allotment as proposed by Mr. Paskvan has a greater population than that of Bagley, Minnesota; Bagley would receive its first local broadcast station. A comparison of persons (utilizing 1990 population data) residing within the 60 dBu contour is tabulated below:

	Paskvan's Proposal (Park Rapids, Minnesota)	DeLaHunt Counterproposal (Bagley, Minnesota)
Total Population:	14,730	23,351
Total Area (sq. km)	2,507	4,771

CONCLUSION

DeLaHunt Broadcasting Corporation believes that the allotment of Channel 222C3 to Bagley, Minnesota is a more efficient use of radio spectrum. More importantly, the proposed Park Rapids, Minnesota, Channel 223A allotment will prevent the opportunity to provide Bagley with its first local service.

DeLaHunt Broadcasting Corporation once again states that should the Commission determine that the public interest would be served by adopting the counterproposal in this docket, it will promptly submit to the Commission and Application for Construction Permit for the proposed Channel 222C3, Bagley, Minnesota allocation.

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This statement and attached exhibits were prepared by me or under my direction and are believed to be true and correct.

Dated: December 14, 1993

A handwritten signature in cursive script, reading "Edward P. DeLaHunt", is written over a horizontal line.

Edward P. DeLaHunt

Study Name: BAGLEY COUNTERPROPOSAL
 BAGLEY , MN
 ZONE 2
 Channel: 222C3
 Latitude: 47 25 23
 Longitude: 95 23 21

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
219C1	KAXE	Grand Rapids	MN 47 15 17	93 26 3	BLED-1533	LIC	100.000	140	96.5	148.93	76.0	72.93
220C	KDSU	Fargo	ND 47 0 48	97 11 37	BLED-820621AB	LIC	100.000	302	252.2	144.07	96.0	48.07
221A	WYRQ	Little Falls	MN 45 56 57	94 17 48	BLH-800516AF	LIC	3.000	91	152.6	183.93	89.0	94.93
221C	CITIFM	Winnipeg	MB 49 34 48	97 10 4	-		360.000	242	332.0	273.45	195.0	78.45
222C3	KXRAFM	Alexandria	MN 45 55 55	95 26 42	BLH-900918KB	LIC	13.500	136	181.5	165.81	153.0	12.81 CLOSE
222C3		Bagley	MN 47 25 23	95 23 21	RM-8379	ADD	.000	0	.0	.00	153.0	-153.00 SHORT
PRM-Counterproposal-Canadian Concurrence required												
73.215 REQUIRED DIST. SEPARATION = 142.0 KM SHORT												
222A	KSSZFM	Oakes	ND 46 7 23	98 5 21	BLH-860613KA	LIC	4.000	46	235.9	251.82	142.0	109.82
*To Channel 224C3, Kindred, ND per D90-405												
222C3		Alexandria	MN 45 54 0	95 39 0	-	USED	.000	0	186.8	170.48	153.0	17.48 CLOSE
Site Restricted-Effective 09-11-89-RSVD for KXRA-FM Per D89-39												
223C1	KKWQ	Warroad	MN 48 49 41	95 23 16	BLH-890830KB	LIC	100.000	141	.0	156.23	144.0	12.23 CLOSE
223A		Park Rapids	MN 46 55 20	95 3 30	RM-8314	ADD	.000	0	155.7	61.07	89.0	-27.93 SHORT
PRM-Canadian concurrence required												
73.215 REQUIRED DIST. SEPARATION = 72.0 KM SHORT												
223C1		Warroad	MN 48 54 18	95 18 54	-	USED	.000	0	1.9	164.87	144.0	20.87
EFFECTIVE 9-2-86												
223C1	NEW	Warroad	MN 48 54 9	95 22 37	BPH-861002TI	CP	100.000	145	.3	164.51	144.0	20.51
224C3	KSSZFM	Kindred	ND 46 39 38	96 43 1	BMPH-920814IC	CP MOD	25.000	100	230.4	131.79	43.0	88.79
From Channel 222A, Oakes, ND per D90-405												
224C3		Kindred	ND 46 38 48	97 0 54	-	USED	.000	0	235.6	150.74	43.0	107.74
Effective 5-4-92-Reserved for KDDRFM per D90-405												
225C1	KKXLFM	Grand Forks	ND 47 57 52	97 1 46	BLH-820909AG	LIC	63.000	119	296.7	137.06	76.0	61.06

END OF STUDY

Study Name: PASKVAN PROPOSAL
 PARK RAPIDS, MN
 ZONE 2
 Channel: 223A
 Latitude: 46 59 6
 Longitude: 95 6 17

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
220C	KDSU	Fargo	ND 47 0 48	97 11 37	BLED-820621AB	LIC	100.000	302	271.9	158.91	95.0	63.91
221A	WYRQ	Little Falls	MN 45 56 57	94 17 48	BLH-800516AF	LIC	3.000	91	151.5	130.81	31.0	99.81
222C3	KXRAFM	Alexandria	MN 45 55 55	95 26 42	BLH-900918KB	LIC	13.500	136	192.7	119.94	89.0	30.94
222C3		Bagley	MN 47 25 23	95 23 21	RM-8379	ADD	.000	0	336.3	53.26	89.0	-35.74 SHORT
PRM-Counterproposal-Canadian Concurrence required 73.215 REQUIRED DIST. SEPARATION = 72.0 KM SHORT												
222C3		Alexandria	MN 45 54 0	95 39 0	-	USED	.000	0	199.3	127.68	89.0	38.68
Site Restricted-Effective 09-11-89-RSVD for KXRA-FM Per D89-39												
223C1	KKWQ	Warroad	MN 48 49 41	95 23 16	BLH-890830KB	LIC	100.000	141	354.2	206.02	200.0	6.02 CLOSE
223C		Golden Valley	MN 44 59 20	93 21 6	-	USED	.000	0	148.0	260.15	226.0	34.15
Coordinates updated from LIC record BLH2901												
223A		Park Rapids	MN 46 55 20	95 3 30	RM-8314	ADD	.000	0	153.2	7.82	115.0	-107.18 SHORT
PRM-Canadian concurrence required 73.215 REQUIRED DIST. SEPARATION = 92.0 KM SHORT												
223C	KQRSFM	Golden Valley	MN 45 3 30	93 7 27	BLH-910814KB	LIC	100.000	315	143.8	263.40	226.0	37.40
223C1		Warroad	MN 48 54 18	95 18 54	-	USED	.000	0	355.9	214.06	200.0	14.06 CLOSE
EFFECTIVE 9-2-86												
223C1	NEW	Warroad	MN 48 54 9	95 22 37	BPH-861002TI	CP	100.000	145	354.7	214.17	200.0	14.17 CLOSE
224C3	KSSZFM	Kindred	ND 46 39 38	96 43 1	BMPH-920814IC	CP MOD	25.000	100	254.2	128.21	89.0	39.21
From Channel 222A, Oakes, ND per D90-405												
224C3		Kindred	ND 46 38 48	97 0 54	-	USED	.000	0	256.2	150.56	89.0	61.56
Effective 5-4-92-Reserved for KDDRFM per D90-405												
225C1	KKXLFM	Grand Forks	ND 47 57 52	97 1 46	BLH-820909AG	LIC	63.000	119	307.7	181.41	75.0	106.41
225C3	NEW	St. Joseph	MN 45 40 24	94 20 42	BPH-921112ME	APP	25.000	100	157.9	157.10	42.0	115.10
Amendment Filed 930209MD												
225C3		St. Joseph	MN 45 37 14	94 22 5	-	USED	.000	0	159.3	161.94	42.0	119.94
Site restriction-Effective 10-13-92												
225C3	KKJM	St. Joseph	MN 45 39 30	94 21 58	BPH-921112MD	CP	25.000	100	158.7	158.06	42.0	116.06
AMENDMENT FILED 930113MG												
277C1	KZCR	Fergus Falls	MN 46 28 6	96 11 54	BLH-811005AH	LIC	100.000	198	235.8	101.43	22.0	79.43

END OF STUDY

Study Name: PASKVAN ALTERNATE
 PARK RAPIDS, MN
 ZONE 2
 Channel: 231A
 Latitude: 46 59 6
 Longitude: 95 6 17

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
229C	WDAYFM	Fargo	ND 47 0 43	97 11 58	BLH-7855	LIC	100.000	314	271.8	159.35	95.0	64.35
230C1	WTBX	Hibbing	MN 47 22 20	93 0 48	BLH-810123AH	LIC	100.000	168	74.0	164.28	133.0	31.28
231C1		Red Lake Indian	MN 47 55 30	95 19 0	RM-8332	ADD	.000	0	351.4	105.72	200.0	-94.28 SHORT
		PRM-Counter Proposal-Alternate Channel-Canadian Concurrence Required										
		73.215 REQUIRED DIST. SEPARATION = 178.0 KM SHORT										
231A	Atwater	MN 45 5 15	94 47 59	-	USED		.000	0	173.5	212.23	115.0	97.23
	SITE RESTRICTED 5.5KM SOUTH-EFFECTIVE 8-13-87											
231A	KYRS Atwater	MN 45 4 24	94 45 20	BLH-881208KC	LIC		3.000	100	172.6	214.20	115.0	99.20
231A	Little Falls	MN 45 58 36	94 21 30	-	USED		.000	0	152.7	125.89	115.0	10.89 CLOSE
	EFFECTIVE 8-28-86											
231A	KFML Little Falls	MN 46 0 16	94 19 42	BLH-881206KA	LIC		3.000	100	151.1	124.23	115.0	9.23 CLOSE
231C1	KSDNFM	Aberdeen	SD 45 25 27	98 31 0	BLH-861124KF	LIC	100.000	134	237.8	315.35	200.0	115.35
232C3	Aitkin	MN 46 36 15	93 39 55	-	VACANT		.000	0	110.6	117.77	89.0	28.77
	Effective 8-13-90-Rsvd for KEZZ, per D89-376											
232A	KEZZ Aitkin	MN 46 32 7	93 50 26	BLH-850312LV	LIC		3.000	100	117.0	108.75	72.0	36.75
	*To channel 232C3 per D89-376											
232A	KMSR	Sauk Centre	MN 45 42 30	95 6 18	BLH-7025	LIC	3.000	91	180.0	141.91	72.0	69.91
234A	KSKK Staples	MN 46 21 34	94 46 55	BPH-920611MI	CP		6.000	38	160.4	73.80	31.0	42.80
	*To channel 234C3 per D93-219											
234C1	KNOXFM	Grand Forks	ND 48 0 20	97 4 18	BLH-791114AK	LIC	100.000	76	308.2	186.66	75.0	111.66
234C3	KSKK Staples	MN 46 23 43	94 57 54	BMPH-931102IE	APP		25.000	95	170.7	66.42	42.0	24.42
	From channel 234A per D93-219											
234C3	Staples	MN 46 23 29	94 57 21	-	VACANT		.000	0	170.2	66.96	42.0	24.96
	PRM-Effective 12-17-93-Reserved for KSKK per D93-219											

END OF STUDY

Study Name: PASKVAN ALTERNATE
 PARK RAPIDS, MN
 ZONE 2
 Channel: 233A
 Latitude: 46 59 6
 Longitude: 95 6 17

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
230C1	WTBX	Hibbing	MN 47 22 20	93 0 48	BLH-810123AH	LIC	100.000	168	74.0	164.28	75.0	89.28
231C1		Red Lake Indian	MN 47 55 30	95 19 0	RM-8332	ADD	.000	0	351.4	105.72	75.0	30.72
231A		PRM-Counter Proposal-Alternate Channel-Canadian				Concurrence Required						
231A		Little Falls	MN 45 58 36	94 21 30	-	USED	.000	0	152.7	125.89	31.0	94.89
231A	KFML	Little Falls	MN 46 0 16	94 19 42	BLH-881206KA	LIC	3.000	100	151.1	124.23	31.0	93.23
232C3		Aitkin	MN 46 36 15	93 39 55	-	VACANT	.000	0	110.6	117.77	89.0	28.77
232A		Effective 8-13-90-Rsvd for KEZZ, per D89-376										
232A	KEZZ	Aitkin	MN 46 32 7	93 50 26	BLH-850312LV	LIC	3.000	100	117.0	108.75	72.0	36.75
232A	KMSR	Sauk Centre	MN 45 42 30	95 6 18	BLH-7025	LIC	3.000	91	180.0	141.91	72.0	69.91
233C	KSTPFM	St. Paul	MN 45 3 45	93 8 22	BMLH-910923KF	LIC	100.000	372	143.9	262.34	226.0	36.34
234A	KSKK	Staples	MN 46 21 34	94 46 55	BPH-920611MI	CP	6.000	38	160.4	73.80	72.0	1.80 CLOSE
234C1		*To channel 234C3 per D93-219										
234C1	KNOXFM	Grand Forks	ND 48 0 20	97 4 18	BLH-791114AK	LIC	100.000	76	308.2	186.66	133.0	53.66
234C3	KSKK	Staples	MN 46 23 43	94 57 54	BMPH-931102IE	APP	25.000	95	170.7	66.42	89.0	-22.58 SHORT
234C3		From channel 234A per D93-219										
234C3		73.215 REQUIRED DIST. SEPARATION =	72.0 KM	SHORT								
234C3		Staples	MN 46 23 29	94 57 21	-	VACANT	.000	0	170.2	66.96	89.0	-22.04 SHORT
234C3		PRM-Effective 12-17-93-Reserved for KSKK per D93-219										
234C3		73.215 REQUIRED DIST. SEPARATION =	72.0 KM	SHORT								
236C1		Detroit Lakes	MN 46 52 5	95 56 46	-	USED	.000	0	258.8	65.39	75.0	-9.61 SHORT
236C1		SITE RESTRICTED-EFFECTIVE 860711-RESERVED FOR KVLR PER D84-719-CLASS CHANGED										
236C1		73.215 REQUIRED DIST. SEPARATION =	73.0 KM	SHORT								
236C1	KKDL	Detroit Lakes	MN 46 40 27	96 13 39	BLH-881003KC	LIC	100.000	296	248.4	92.37	75.0	17.37 CLOSE
286C1	KLTA	Breckenridge	MN 46 32 41	96 37 33	BMLH-930113KB	LIC	100.000	198	247.6	126.09	22.0	104.09

END OF STUDY

Study Name: PASKVAN ALTERNATE
 PARK RAPIDS, MN
 ZONE 2
 Channel: 240A
 Latitude: 46 59 6
 Longitude: 95 6 17


CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
238C1	Bemidji	MN 47 28 49	94 52 49	RM-8250	ADD	.000	0	17.0	57.63	75.0	-17.37	SHORT
Accepted by Canada 930816												
73.215 REQUIRED DIST. SEPARATION = 73.0 KM SHORT												
238C1	Red Lake Indian	MN 47 55 30	95 19 0	RM-8332	ADD	.000	0	351.4	105.72	75.0	30.72	
PRM-Counterproposal-Canadian Concurrence Required												
239C1	KDALFM Duluth	MN 46 47 7	92 7 15	BLH-850711KF	LIC	100.000	245	94.5	228.52	133.0	95.52	
239C1	KKOKFM Morris	MN 45 36 11	95 53 14	BLH-7852	LIC	100.000	110	201.7	165.02	133.0	32.02	
240A	Pillager	MN 46 14 59	94 26 33	RM-8374	ADD	.000	0	148.0	96.20	115.0	-18.80	SHORT
PRM-Site Restriction 9.2 km Southeast-Canadian Concurrence Required												
73.215 REQUIRED DIST. SEPARATION = 92.0 KM CLOSE												
241C1	KIXX Watertown	SD 45 10 31	96 59 15	BLH-920413KD	LIC	100.000	298	216.5	248.34	133.0	115.34	
241C1	KQHT Crookston	MN 47 50 43	96 50 22	BLH-850913KA	LIC	100.000	126	306.9	162.13	133.0	29.13	
241C1	Coleraine	MN 47 21 24	93 25 47	-	USED	.000	0	71.3	133.54	133.0	.54	CLOSE
Canadian Concurrence required-Accepted by Canada on 900905												
241C1	KGPZ Coleraine	MN 47 19 31	93 16 18	BPH-910515MC	CP	100.000	176	74.1	144.07	133.0	11.07	CLOSE
243C1	KJKFM Fergus Falls	MN 46 14 43	95 58 46	BLH-811103AE	LIC	100.000	171	219.4	106.07	75.0	31.07	
294C1	WJJYFM Brainerd	MN 46 26 36	94 22 58	BLH-780710AV	LIC	100.000	137	137.3	81.69	22.0	59.69	

END OF STUDY

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary in the law firm of Pepper & Corazzini, do hereby certify that a true copy of the foregoing "Reply Comments" was sent this 15th day of December, 1993, by first-class United States mail, postage prepaid, to the following:

Harry F. Cole, Esquire
Bechtel & Cole, Chartered
1901 L Street, N.W.
Suite 250
Washington, D.C. 20036
(Counsel to Roger Paskvan)


Tracey S. Westbrook